Kitaeff & Associates, P.C.
65A Flagship Drive
North Andover, MA 01845
978-687-1818

INVOICE

Invoice #	**273**
Invoice Date	Feb 13, 2017
Matter #	C00202
Terms	Due Upon Receipt

Re: Lunde, John

Bill To:

Lunde, John
45 Avery Park Drive
North Andover, MA 01845

Date	Description	Staff	Rate	Hours	Amount
May 26, 2016	Conducted title rundown of client's home. Printed all documents and prepared abstract. Title is convoluted and apparently rife with errors that need further research.	*JAB*	$250.00	1.5	$375.00
May 26, 2016	Copies of title documents		65@$0.15	Expense	$9.75
May 26, 2016	Prepared Homestead for client and his wife	*JAB*	$250.00	0.2	$50.00
May 26, 2016	Worked with client for preparation of initial documents, including Petition, etc. Discussed alternative strategies, need for additional documents including second mortgage materials, etc. Telephone discussion with Crystal at Harmon Law Offices and prepared Letter of Representation for client to sign. Had paralegal fax same to Harmon. Scheduled follow up with client and spouse to sign Homestead tonight and will then set up follow up meeting for tomorrow morning to continue document preparation.	*JAK*	$325.00	1.2	$390.00
May 26, 2016	Conference with JAB regarding client's spouse and it appears that there is a substantial exon on record against her.	*JAK*	$325.00	0.1	$32.50
May 26, 2016	Received and reviewed fax from Harmon showing both the reinstatement figures and payoff figures. Conference with JAB.	*JAK*	$325.00	0.2	$65.00
May 27, 2016	Office conference with client. Worked on preparation (with paralegal) of	*JAK*	$325.00	0.9	$292.50

Date	Description	Staff	Rate	Hours	Amount
	schedule B. Discussions regarding valuation of assets, etc. Suggested to client that he obtain documentation to show his interest in the proposed venture that should "close in September".				
May 27, 2016	Worked with client on Schedule B (time without JAK)	*SXA*	$80.00	0.3	$24.00
May 29, 2016	Researched possible causes of action under G.L. c. 244 s. 14 & 35C, 93A, FDCPA, etc.	*JAB*	$250.00	1.2	$300.00
May 30, 2016	Reviewed emails from JAB and cases and JAB's research	*JAK*	$325.00	0.9	$292.50
May 31, 2016	Conference with client re title issues, issues re possible lack of standing of CitiMortgage to foreclose, possible causes of action under state and federal law, including 93A, as well as damages and injunctive relief. Client agreed to further investigation.	*JAB*	$250.00	0.5	$125.00
May 31, 2016	Conference with JAB in anticipation of meeting with client (.4). Meeting with client to discuss essentials of strategy (.3). Left JAB with client to continue meeting	*JAK*	$325.00	0.7	$227.50
Jun 01, 2016	Reviewed files at Land Court related to both Servicemembers cases filed by CitiMortgage (one in 2010 and one in 2015). Discussed matter with assistant clerk and colleague. Travel time billed at one half rate. Total time = 3 hours. Travel time = 2 hours. Total billable time = 2 hours.	*JAB*	$250.00	2	$500.00
Jun 01, 2016	Conference with JAB and colleague regarding a 93A complaint and a TRO and a preliminary injunction, all before the scheduled foreclosure date. As a result of JAB's research at the Land Court.	*JAK*	$325.00	0.4	$130.00
Jun 02, 2016	Began drafting 93A demand letter.	*JAB*	$250.00	1	$250.00
Jun 03, 2016	Completed first draft of 93A demand letter with additional demand to immediately cease foreclosure proceedings.	*JAB*	$250.00	2.7	$675.00

Date	Description	Staff	Rate	Hours	Amount
Jun 03, 2016	Series of brief discussions with JAB regarding his preparation of the demand letter.	*JAK*	$325.00	0.2	$65.00
Jun 05, 2016	Revised draft of demand letter. Need additional information from clients' credit reports.	*JAB*	$250.00	0.3	$75.00
Jun 06, 2016	Discussion with colleague who recently had similar case involving lack of standing.	*JAB*	$250.00	0.2	$50.00
Jun 08, 2016	Worked with client and paralegal. Client reviewed and executed Voluntary Petition and related initial skeleton documents.	*JAK*	$325.00	0.4	$130.00
Jun 13, 2016	Received email from client and printed several attachments regarding upcoming transaction	*SXA*	$80.00	0.1	$8.00
Jun 15, 2016	Reviewed email from client requesting update regarding Harmon "agreement"? Prepared detailed response indicating little success with Harmon, so far. Need something more concrete than a Letter of Intent to attempt to convince the bank to voluntarily agree to postpone. If no agreement with Harmon, then the skeleton petition will be filed and the automatic stay will force the bank.	*JAB*	$250.00	0.2	$50.00
Jun 16, 2016	Filed skeleton petition with Court.	*SXA*	$80.00	0.2	$16.00
Jun 20, 2016	Received Notice of 341 Meeting from Court for client and sent letter notifying him of same. Meeting will be held July 29, 2016 at 10:30 am in Worcester	*SXA*	$80.00	0.1	$8.00
Jun 21, 2016	Prepared Motion to Extend time to file documents and had paralegal file same with Court.	*JAK*	$325.00	0.2	$65.00
Jun 24, 2016	Worked with paralegal and associate in the preparation of the Matrix, in compliance with Order to Update.	*JAK*	$325.00	0.3	$97.50
Jun 25, 2016	Office conference with client. Installed info into Bestcase	*JAK*	$325.00	0.9	$292.50
Jun 30, 2016	Reviewed Notice of Appearance, etc. as filed by Richard Mulligan on behalf of JP Morgan Chase Bank, N.A.	*JAK*	$325.00	0.1	$32.50

Date	Description	Staff	Rate	Hours	Amount
Jun 30, 2016	Reviewed schedules as entered in Best Case. Made revisions to all Schedules and Statement of Affairs. Calculated and re-drafted plan.	*JAB*	$250.00	1.6	$400.00
Jun 30, 2016	Meeting with client to review schedules and plan. Made further revisions. Discussed payments to Trustee and mortgages. Discussed status of pending business opportunity.	*JAB*	$250.00	1.1	$275.00
Jul 01, 2016	Reviewed schedules and Statement of Financial Affairs and prepared remaining documents for filing with the Court.	*JAK*	$325.00	0.3	$97.50
Jul 01, 2016	Conference with client and prepared Motion to Amend Matrix. Filed same with Court.	*JAK*	$325.00	0.3	$97.50
Jul 06, 2016	Received and reviewed correspondence from mortgagees banks. Prepared letter to client. Had paralegal fill in the authorization for the bank to discuss "loan modification and alternatives" with client.	*JAK*	$325.00	0.2	$65.00
Jul 07, 2016	Reviewed email from client regarding correspondence from banks. Emailed response.	*JAK*	$325.00	0.1	$32.50
Jul 07, 2016	Received and reviewed endorsed Order on Motion to Amend Matrix	*SXA*	$80.00	0.1	$8.00
Jul 13, 2016	Email to client requesting copies of 60 days Prepared and filed-petition paystubs, as well as the current one.	*MD*	$80.00	0.1	$8.00
Jul 15, 2016	Prepared package of documents for chapter trustee 341 meeting.	*MD*	$80.00	0.2	$16.00
Jul 15, 2016	postage for trustee package.		$6.80	Expense	$6.80
Jul 15, 2016	copies of documents for trustee and duplicate copy for file.		200@$0.15	Expense	$30.00
Jul 25, 2016	Reviewed Objection to Confirmation of Plan, filed by bank's counsel, citing a different amount of pre-petition arrearage on the mortgage on the house.	*JAK*	$325.00	0.1	$32.50
Jul 26, 2016	Reviewed Notice of Mortgage Payment Change.	*JAK*	$325.00	0.1	$32.50
Jul 29, 2016	Attended 341 meeting in Worcester	*JAK*	$325.00	2	$650.00

Date	Description	Staff	Rate	Hours	Amount
	with client. Time includes travel at 1/2 regular rate. Legal .7 (including waiting time); travel 2.6 at half = 1.3 = 2.0 total				
Aug 01, 2016	Prepared letter to client summarizing what is needed to comply with requests made by the Chapter 13 Trustee.	*JAK*	$325.00	0.2	$65.00
Aug 03, 2016	Reviewed Court Order granting Agreed Order filed by Chapter 13 Trustee.	*JAK*	$325.00	0.1	$32.50
Aug 15, 2016	Received notification that the Court has sustained the Objection to Confirmation of the plan as filed by JP Morgan Chase Bank, N.A. Client ordered to amend or modify the Chapter 13 Plan within 30 days.	*JAK*	$325.00	0.1	$32.50
Aug 16, 2016	Email to client requesting they stop by the office to sign an Affidavit for the Trustee.	*JAB*	$250.00	0.1	$25.00
Aug 19, 2016	Letter to Chapter 13 Trustee enclosing check in the amount of $222.00 which represents the balance of client's first plan payment.	*SXA*	$80.00	0.1	$8.00
Sep 02, 2016	Discussion wiwth JAB regarding Tr's Notice of Non Compliance. With respect to the anticipated (and necessary) Affidavit to be provided by family member.	*JAK*	$325.00	0.1	$32.50
Sep 07, 2016	Email from client regarding bringing his son to the office tomorrow. Need notarizing the paperwork for the Trustee.	*JAB*	$250.00	0.1	$25.00
Sep 08, 2016	Brief meeting with client's son. Explained the need for the affidavit and the terms as dictated by client. Client's son signed affidavit and JAK notarized same.	*JAK*	$325.00	0.1	$32.50
Sep 08, 2016	Prepared affidavit for client's son, Jonathan Lunde.	*JAB*	$250.00	0.2	$50.00
Sep 09, 2016	Prepared draft of Response to Chapter 13 Trustee's Certificate of NonCompliance	*RVF*	$80.00	0.1	$8.00
Sep 09, 2016	Edited response and filed same.	*JAB*	$250.00	0.2	$50.00
Sep 09, 2016	Faxed copy of affidavit to the Trustee	*JAB*	$250.00	0.2	$50.00

Date	Description	Staff	Rate	Hours	Amount
	and delivered original.				
Sep 14, 2016	Prepared affidavit for client to sign per Court's Order.	*JAB*	$250.00	0.2	$50.00
Sep 19, 2016	Completed draft of First Amended Chapter 13 Plan. Meeting with client to review and sign.	*JAK*	$325.00	0.3	$97.50
Sep 19, 2016	Email to client asking him to review and approve the Amended Plan. Sent Amended Plan (word and pdf). Made notation regarding the adjustment of Chase's second mortgage. Chase has not yet filed a Proof of Claim and the office can still object to the amount (if need be) once they file a formal claim.	*JAB*	$250.00	0.2	$50.00
Sep 20, 2016	Postage for service of Motion to Amend Plan and First Amended Plan to 20 creditors		20@$0.46	Expense	$9.30
Sep 20, 2016	Copies of Motion to Amend Plan and First Amended Plan		60@$0.15	Expense	$9.00
Sep 20, 2016	Filed Motion to Amend Chapter 13 Plan and Amended Chapter 13 Plan with Court along with service to 20 creditors.	*SXA*	$80.00	0.4	$32.00
Sep 28, 2016	Reviewed Motion filed by Chapter 13 Trustee to withdraw her Affidavit of Non-Compliance.	*JAK*	$325.00	0.1	$32.50
Oct 18, 2016	Received Motion of Chapter 13 Trustee for Order Dismissing case, and forwarded to client with request he call office ASAP.	*SXA*	$80.00	0.1	$8.00
Oct 19, 2016	Email from client attaching Gantt chart for the close of the transactions, expecting the close to on schedule. Looking forward to meeting to discuss the following week.	*JAB*	$250.00	0.1	$25.00
Nov 07, 2016	Reviewed Order granting the Trustee's Motion to Extend Time to object to confirmation. Deadline for the Trustee is extended to December 23, 2016.	*JAK*	$325.00	0.1	$32.50
Nov 14, 2016	Conference with JAK and prepared Response to Chapter 13 Trustee's Motion for Order Dismissing Case.	*JAB*	$250.00	0.5	$125.00
Nov 17, 2016	Reviewed notification that the Court has scheduled a hearing for December	*JAK*	$325.00	0.1	$32.50

Date	Description	Staff	Rate	Hours	Amount
	20, 2016 at 1:00 p.m. in Worcester on the Trustee's Motion for Order Dismissing Case.				
Dec 07, 2016	Email from client regarding his conference call in the morning relative to shareholder's agreement and looking forward to providing "final dates".	*JAB*	$250.00	0.1	$25.00
Dec 12, 2016	Review email from client where he indicates that the attorneys expect to have the contracts signed by the end of the week for a closing first week in January (?).	*JAB*	$250.00	0.1	$25.00
Dec 15, 2016	Reviewed email from client. "Final clean docs" are going to the seller, all issues appear to be resolved and looking forward to signatures early next week.	*JAB*	$250.00	0.1	$25.00
Dec 16, 2016	Prepared draft Motion to Continue Hearing (joint with Trustee). Prepared detailed cover letter to Trustee explaining circumstances re: debtor's business dealings. Faxed all of the above to the Trustee.	*JAB*	$250.00	0.5	$125.00
Dec 19, 2016	Received assent from Trustee to file Motion to Continue. Filed the Motion.	*JAB*	$250.00	0.1	$25.00
Dec 19, 2016	Court Order allowing the Motion to Continue the hearing. Hearing continued to January 24th. Email client	*JAK*	$325.00	0.1	$32.50
Jan 12, 2017	Email to client requesting status on the business deal.	*SXA*	$80.00	0.1	$8.00
Jan 20, 2017	Another email to client requesting status and udpate. Client replies that closing had to delay another week.	*JAB*	$250.00	0.1	$25.00
Jan 23, 2017	Emails with client re status of closing	*JAB*	$250.00	0.2	$50.00
Jan 23, 2017	Printed and reviewed consulting agreement provided by client in support of hearing tomorrow. Discussion with JAK.	*JAB*	$250.00	0.2	$50.00
Jan 23, 2017	Reviewed detailed email forwarded by client regarding close of business transaction and various funding accounts. Brief conference with associate. Confirmed funds to be deposited by wire into Lunde's	*JAK*	$325.00	0.2	$65.00

Date	Description	Staff	Rate	Hours	Amount
	account.				
Jan 24, 2017	Email to client about hearing being canceled due to weather. Numerous emails back and forth during the morning.	*JAB*	$250.00	0.3	$75.00
Jan 24, 2017	Reviewed claims register, plan and Trustee's Motion to Dismiss. Marked up plan with needed changes.	*JAB*	$250.00	0.2	$50.00
Jan 24, 2017	Dictated letter to Chapter 13 Trustee suggesting stipulation to file amended plan within 30 days now that client's anticipated financial changes have occurred. Prepared draft stipulation and sent to Trustee along with letter.	*JAB*	$250.00	0.5	$125.00
Jan 24, 2017	Email to client regarding rescheduling of hearing and need to meet right away to review the plan.	*JAB*	$250.00	0.2	$50.00
Jan 25, 2017	Reviewed response from Chapter 13 Trustee indicating that she will only agree to stipulation if client cures plan payment arrears.	*JAB*	$250.00	0.1	$25.00
Jan 25, 2017	Email to client regarding Trustee's insistence on curing plan arrears.	*JAB*	$250.00	0.1	$25.00
Jan 26, 2017	Filed Stipulation by client and Chapter 13 Trustee and Motion to Approve same per JAB.	*SXA*	$80.00	0.1	$8.00
Jan 26, 2017	Revised Stipulation to include payment of plan arrears within 14 days. Faxed same to Trustee for approval.	*JAB*	$250.00	0.2	$50.00
Jan 26, 2017	Received approval from Trustee on Stipulation.	*JAB*	$250.00	0.1	$25.00
Jan 27, 2017	Reviewed Endorsed Order allowing the Stipulation entered into between the debtor and the Chapter 13 Trustee. The hearing scheduled for January 30 is cancelled.	*JAK*	$325.00	0.1	$32.50
Jan 30, 2017	Brief conference with client regarding status, deal, Ch 13, etc. JAB to continue conference with client	*JAK*	$325.00	0.1	$32.50
Jan 30, 2017	Meeting with client to discuss claims, budget going forward, and different possibilities for make-up of amended chapter 13 plan. Discussed strategy in general and referred client to CPA to	*JAB*	$250.00	0.5	$125.00

Date	Description	Staff	Rate	Hours	Amount
	determine how he will handle withholdings and/or quarterly tax payments for new income.				
Jan 31, 2017	Telephone conversation with Chase re amount of monthly post-petition mortgage payments.	*JAB*	$250.00	0.2	$50.00
Jan 31, 2017	Left message for Jason Giguire at Harmon Law Offices asking for legible copy of attachment to Chase's proof of claim.	*JAB*	$250.00	0.1	$25.00
Jan 31, 2017	Reviewed claims filed by Ditech and Chase to determine current post-petition monthly payment amount. Chase's claim is illegible.	*JAB*	$250.00	0.1	$25.00
Jan 31, 2017	Email to client confirming mortgage payment amounts.	*JAB*	$250.00	0.1	$25.00
Feb 06, 2017	Reviewed email from client where he indicated that he paid a substantial amount to the Trustee via TSF bill pay, however, he received an email that smaller amounts were credited and a larger amount was canceled. Client offered to bring a bank check to our office, to be sent to the Trustee. Reply email to client confirming that he should bring a bank check (payable to "Chapter 13 Trustee") to our office so that we can send a letter to the Chapter 13 Trustee.	*JAK*	$325.00	0.2	$65.00
Feb 07, 2017	Letter to Trustee enclosing cashier's check provided by client in the amount of $30,007.00 as the balance owed per the stipulation. Client was unable to make the full payment through the TSF system.	*SXA*	$80.00	0.1	$8.00

Total Fees	$8,505.50
Total Expenses	$64.85
Subtotal	$8,570.35
Previous Balance	$0.00
Total	**$8,570.35**
Total Payments	-$2,000.00
Balance	**$6,570.35**

Your trust balance prior to this invoice : $0.00. Your current trust balance as of 02/13/2017 is $0.00

Please Pay : $6,570.35

Timekeeper Summary

Timekeeper	Hours	Fee Billed
SXA - Suzanne Antinoro [Paralegal]	1.70 h	$136.00
JAB - Joshua Burnett [Associate]	18.40 h	$4,600.00
MD - Mildred Diaz [Paralegal]	0.30 h	$24.00
RVF - Ruben Fernandez [Paralegal]	0.10 h	$8.00
JAK - Jeffrey Kitaeff [Partner]	11.50 h	$3,737.50
Total	**32.00 h**	**$8,505.50**

Payments (As of 02/13/2017)

Date	Invoice#	Amount
May 26, 2016	273	$2,000.00
Total		**$2,000.00**

Total billed including this invoice $8,570.35 (Fees: $8,505.50, Expenses: $64.85)